

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDI C. BARTLOW,

Defendant.

**NOTICE OF MOTION TO
ADJOURN VIOLATION
HEARING**

Case No. 23-mj-01022-JJM

COMES NOW the defendant, by and through his attorneys, LIPSITZ GREEN SCIME CAMBRIA LLP, BARRY NELSON COVERT, ESQ., and upon the annexed declaration of Barry Nelson Covert, Esq., hereby moves this Court for an adjournment of the Continued Violation Hearing currently scheduled for November 2, 2023 at 10:00 a.m. for such other and further relief as this Court deems just and proper under the circumstances.

DATED: Buffalo, New York
November 2, 2023

Yours truly,

BARRY NELSON COVERT, ESQ.
Attorneys for Defendant, Brandi Bartlow
Office and Post Office Address
42 Delaware Avenue, Suite 120
Buffalo, New York 14202
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TO: JOSHUA VIOLANTI, ESQ.
ASSISTANT UNITED STATES ATTORNEY
United States Attorney's Office
138 Delaware Avenue
Buffalo, New York 14202

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

DECLARATION

v.

Case No. 23-mj-01022-JJM

BRANDI C. BARTLOW,

Defendant.

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

BARRY NELSON COVERT, ESQ., being an attorney admitted to practice law in this State and District, and subject to the penalties of perjury, does hereby declare the following to be true and correct:

1. I am an attorney at law; I am a senior partner associated with the law firm of Lipsitz Green Scime Cambria LLP and I represent the defendant, Brandi Bartlow.
2. By order of United States Magistrate Judge Jeremiah J. McCarthy, the Continuation of Violation Hearing is currently scheduled for November 2, 2023 at 11:00 a.m. (Dkt. 44).
3. Defense is respectfully requesting an adjournment to November 15, 2023 of the continuation of violation hearing.
4. Your deponent spoke with a counselor from the rehabilitation facility and was advised that Ms. Bartlow has been accepted for inpatient treatment. They are waiting for a bed to become available.

5. Further, your deponent is currently out of town on business.

6. My office contacted Assistant United States Attorney Joshua Violanti, and he does not object to this request.

WHEREFORE, for the reasons set forth above, defense respectfully requests an adjournment to November 15, 2023 of the continuation of violation hearing, and for such other and further relief as this Court deems just and proper under the circumstances.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 1, 2023 in Buffalo, New York.

Respectfully submitted,

s/Barry Nelson Covert, Esq.
Barry Nelson Covert, Esq.